

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOHN AND JANE DOE NO. 1, et al.,

Plaintiffs,

v.

BETHEL LOCAL SCHOOL DISTRICT
BOARD OF EDUCATION, et al.,

Defendants.

Case No. 3:22-cv-00337

JUDGE MICHAEL J. NEWMAN

**[PROPOSED] ORDER OF
PROTECTION ALLOWING PROPOSED
INTERVENOR-DEFENDANT ANNE
ROE TO PROCEED
PSEUDONYMOUSLY**

This matter having come before the Court on Proposed Intervenor-Defendant Anne Roe's (a minor, by and through her legal guardian Joanne Roe) Motion for Protective Order and Leave to Proceed Anonymously and the Court having reviewed Anne Roe's motion and for good cause shown, it is hereby ORDERED:

1. Anne Roe (a minor, by and through her legal guardian Joanne Roe) is permitted to bring this action as Anne Roe to protect her identity from public disclosure;
2. In all publicly filed documents, Anne Roe shall only be identified as Anne Roe.
3. All documents filed with this Court that contain the full name of Anne Roe or contain information that identifies her, directly or indirectly, shall be filed under seal;
4. Upon request, Anne Roe will disclose her identity to counsel for any party in this matter. In that event, Anne Roe need only disclose the minimum information necessary for that party to litigate their case;
5. Counsel for any party in this matter may disclose Anne Roe's identity to their clients, their agents, and to any experts retained in this case, but only to the minimum extent necessary to litigate this action;

6. Every individual to whom disclosure of Anne Roe's identity is made shall read and be bound by this Order. Counsel for the parties shall ensure that persons to whom disclosure is made under paragraphs 4 and 5 above are aware of this Order; and

7. Under no other circumstances shall any party; counsel for any party, or any agent or employee of same; officers or employees of a party; independent consultants or expert witnesses retained by a party, including agents or employees of same; or any other agent or representative of a party, including but not limited to counsel, or expert witnesses retained by a party or counsel, intentionally disclose Anne Roe's identity without her counsel's written consent.

IT IS SO ORDERED.

United States District Judge

Dated January ___, 2023